

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JEFFREY KIRBY,

Plaintiff,

-against-

YONKERS SCHOOL DISTRICT and
BERNARD PIERARZIO, sued in his
individual capacity,

Defendants.

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DEFENDANTS' RULE 26(a)(1)
INITIAL DISCLOSURES

07-10684 (SCR)

ECF Case

Pursuant to FRCP 26(a)(1)(A), Defendants Yonkers School District ("District") and Bernard Pierarzio (*sic*) ("Pierorazio") by their attorneys, Donoghue, Thomas, Auslander & Drohan, LLP, hereby provide the following initial disclosure:

I. Individuals Likely to Have Discoverable Information That May Be Used to Support Defendants' Defenses.

Disclosure

1. Bernard P. Pierorazio, Superintendent
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8667
2. Dennis Campanera, Principal
PEARLS Hawthorne School
350 Hawthorne Avenue
Yonkers, NY 10705
(914) 376-8250
3. Cara Caico, Assistant Principal
PEARLS Hawthorne School
350 Hawthorne Avenue
Yonkers, NY 10705
(914) 376-8250

4. Susan V. Fierson, Assistant Principal
PEARLS Hawthorne School
350 Hawthorne Avenue
Yonkers, NY 10705
(914) 376-8250
5. Robert Riccuiti, Principal
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
6. Beverly Turner-Nash, Assistant Principal
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
7. Michelle Yazurlo, Assistant Principal
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
8. Marwan Sayegh, Assistant Principal
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
9. Dr. Marta Lugo, Director of Personnel
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8106
10. Dr. Donna Martuge, Director of Student Registration
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8000

11. James W. Rose, Director of Health/Physical Education/Athletics
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8000
12. Sheryl Chasin, Director of Professional Development
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8000
13. Pasquale Piccirella, Director of Transportation, Safety and Security
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701
(914) 376-8000
14. Orlando Menieru, Public Safety Officer
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
15. Michael Lanteri, Public Safety Officer
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
16. Jane Weinberg, Teacher
Emerson Middle School
160 Bolmer Avenue
Yonkers, NY 10703
(914) 376-8300
17. Patricia Puleo, President
Yonkers Federation of Teachers
35 East Grassy Sprain Road
Yonkers, NY 10710
(914) 793-0200

18. Fran Ruggiero, Middle School Vice President
Yonkers Federation of Teachers
35 East Grassy Sprain Road
Yonkers, NY 10710
(914) 793-0200
19. Carolyn Jones, Parent
80 School Street, Apt. 5K
Yonkers, NY 10701
20. Kahssai Duhaney, Student
c/o Carolyn Jones
80 School Street, Apt. 5K
Yonkers, NY 10701

II. DOCUMENTS AND LOCATION.

1. Plaintiff's Personnel File
Yonkers Public Schools
One Larkin Center
Yonkers, NY 10701

III. INSURANCE

After commencement of discovery, the applicable insurance agreement between the District and ACE USA will be made available for copying and inspection, as required, at the offices of Donoghue, Thomas, Auslander, and Drohan, LLP, 2517 Route 52, Hopewell Junction, NY 12533.

Defendants reserve their rights to supplement their disclosure to the extent necessary and appropriate pursuant to the applicable provisions of the Federal Rules of Civil Procedure.

Dated: June , 2008

Yours, etc.,

DONOGHUE, THOMAS, AUSLANDER & DROHAN, LLP

By: /s/ Vincent P. D'Andrea
Vincent P. D'Andrea (6614)
Attorneys for Defendant
2517 Route 52
Hopewell Junction, NY 12533
Tel. No. 845/227-3000
Fax No. 845/227-6873

TO: Michael H. Sussman, Esq.
Attorneys for Plaintiff
Sussman & Watkins
40 Park Place
P.O. Box 1005
Goshen, NY 10924